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**Commission on Ethics &
Public Trust
Miami-Dade County**

Memorandum

To: The Honorable Barbara Jordan, Commissioner

The Honorable Carlos Alvarez, Mayor
The Honorable Chairperson, Joe Martinez
Members, Board of County Commissioners

From: Robert Meyers, Executive Director, Commission on Ethics and Public Trust

Date: June 10, 2005

Re: Final Audit Report – Barbara Jordan Election Campaign 2004

Attached is your copy of the above referenced audit report. Overall, the Commission on Ethics (COE) concluded that the campaign expenditures were in compliance with the requirements of the Miami-Dade County Code §12-22 (G), "Use of Funds," as no disallowed expenses were paid with public funds.

However, the COE found that the \$100,000 expenditure limit set forth by County Code §12-22 (e) (2) had been exceeded during the run-off election period. Specifically, the campaign's expenditures during the run-off election totaled \$111,365.92. Lastly, the COE noted a few instances of noncompliance with Florida Statute Section 106, "Campaign Financing."

cc: Kerry Rosenthal, Chairman, Commission on Ethics and Public Trust
Anthony Brunson, Campaign Treasurer
Lester Sola, Supervisor of Elections

Commission on Ethics & Public Trust

Miami-Dade County

FINAL
Audit Report

**Post-Election Audit of the
Barbara Jordan
Campaign Account**

June 10, 2005

Commission on Ethics & Public Trust
Post-Election Audit of the Barbara Jordan Campaign Account
FINAL AUDIT REPORT
June 10, 2005

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**COMMISSION ON ETHICS & PUBLIC TRUST
POST-ELECTION AUDIT OF THE CAMPAIGN ACCOUNT OF
BARBARA JORDAN
COMMISSION CANDIDATE 2004**

EXECUTIVE SUMMARY

Item No.	<u>Audit Findings</u>	<u>FL Statute/ County Code Violation</u>	<u>Comments</u>
1	The candidate's expenditures during the run-off election exceeded the \$100,000, limit by \$11,365.92. (p. 4)	County Code §12-22 (e) (2) "... a candidate for the Board of County Commissioners may expend a total of one hundred thousand dollars (\$100,000) during the run-off election."	The Barbara Jordan campaign made expenditures totaling \$111,365.92 during the run-off election period.
2	Approximately \$18,785.07 was paid in cash to campaign workers and other vendors for campaign related expenses. (pp. 5 – 7.)	Florida Statute §106.12 , "Petty Cash Funds Allowed," states that the only cash payments allowed under state law are from a petty cash fund.. Expenditures for office supplies, transportation expenses, and other necessities are the only expenses allowed to be paid with petty cash funds.	<p>Campaign treasurer, Anthony Brunson, cashed out two (2) checks from the Jordan campaign account totaling \$13, 500. Cash payments totaling \$10,323.04 were made to campaign workers and other vendors for various campaign related expenses; \$706.77 was re-deposited into the campaign bank account, and the remaining balance of \$2,470.19 is unaccounted for. (See Exhibits E &F.)</p> <p>Campaign manager, Wade Jones, cashed out eleven (11) checks from the Jordan campaign account totaling \$14,505 for the purpose of making cash payments to campaign workers. (See Exhibit G.)</p> <p>Mr. Jones provided the COE with copies of the timesheets for the campaign workers that he issued payments to, which totaled \$8,462.03. The remaining balance of \$6,042.97 is unaccounted for.</p>

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EXECUTIVE SUMMARY

3	\$3,648.25 in campaign expenditures paid through a third party intermediary. (p. 7)	FL Stats. §106.021 (3) and §106.11(1) prohibit direct or indirect campaign expenditures in furtherance of a candidate's election campaign except through the campaign treasurer drawing checks from the campaign bank account.	The Jordan Campaign contracted with the "Haitian Evangelical Christian Association, Inc." (HECA) to carry out its Haitian-American GOTV initiative. HECA was paid \$3,648.25, which covered expenses for poll workers, coordinators, meals, car rental expenses and gasoline. (See Exhibit H.)
4	\$11,300.69 paid to media consultant Stephanie Bromfield-Warnell (SBW & Associates) for the procurement of radio air time and newspaper advertisements. (pp. 8 – 9.)	Florida Elections Commission decisions DE 03-08 and DE 86-14 , which interprets Florida Statute §106.11(1) , states the following: "A candidate who is procuring both media related consultant services and mass media political advertisements <i>must issue separate checks drawn on the campaign account to media consultant for their services and to each media outlet that is providing advertising services.</i> "	The Jordan campaign reimbursed Stephanie Bromfield-Warnell (SBW & Associates) \$9,960 for the purchase of radio airtime on HOT 105 and WEDR. (See Exhibit I.) The campaign also reimbursed SBW & Associates \$1,340.69 for two (2) newspaper advertisements that were published in the <i>Miami Times Newspaper</i> . (See Exhibit J.)
5	IRS Forms 1099-MISC not filed for payees who received payments equal to or greater than \$600 from the campaign for services provided. (p. 9)		In the process of examining the campaign accounting records, the COE found that the campaign failed to complete and file IRS Forms 1099 for two (2) consultants that received payments equal to or greater than \$600.

INTRODUCTION

In March of 2001, the Miami-Dade County Board of County Commissioners adopted Ordinance No. 01-39 (the Ordinance) for campaign financing reform and is codified in Miami-Dade County Code §12-22. The Ordinance is intended to make the political process more accessible to candidates who run for the office of County Mayor or Commissioner by providing eligible candidates with public financing from the Election Campaign Financing Trust Fund (the Fund).

The Ordinance establishes the eligibility requirements that a candidate must meet in order to receive public financing from the Fund. For the office of County Commissioner, each candidate who satisfies these requirements may be eligible for a maximum contribution of \$75,000 in the primary election, and an additional \$50,000 if a run-off election occurs. For the office of Mayor, each candidate who satisfies the eligibility requirements may receive \$300,000 for the primary election and an additional \$200,000 if the candidate is in a run-off election.

The Ordinance also addresses expenditure limitations for candidates who receive public financing. For Commission candidates, total campaign expenditures are limited to \$150,000 during the primary election and \$100,000 during the run-off election. For Mayoral candidates, total campaign expenditures are limited to \$600,000 in the primary election and \$400,000 if a run-off election occurs. In either case, if one candidate raises contributions or makes expenditures that exceed the applicable spending limits, the expenditure ceiling is lifted for all other candidates who are campaigning for that office and an expenditure limit is no longer in effect for that particular election race (i.e., the office of Mayor or a Commission seat for a particular county district).

Additionally, the Ordinance requires the Commission on Ethics (COE) to conduct post-election audits ninety (90) days following the date of the election for those candidates who received public financing from the County. This is in keeping with the requirements of both §12-22 (f)(6) of the Code of Miami-Dade County and Florida Statute §106.141 (4), which state that the candidate dispose of any surplus funds remaining in the campaign account within 90-days of the election date by: (1) returning all surplus funds to the Election Campaign Financing Trust Fund; and, (2) any funds remaining in the campaign account that are in excess of the public funding received should be disposed of per Florida Statute §106.141, Disposition of Surplus Funds.

Accordingly, the COE conducted a post-election audit of the campaign account of Ms. Barbara Jordan, District 1 County Commission candidate, who received a total of \$125,000 in public funding: (1) \$75,000 for the primary election held on August 31, 2004; and, (2) an additional \$50,000 for the run-off election held on November 2, 2004.

PURPOSE & SCOPE OF THE AUDIT

The post-election audit conducted by the COE focuses primarily on campaign expenditures as other Miami-Dade County agencies have been involved in current, on-going examinations of all campaign contributions for those candidates who received public monies. Therefore, to avoid redundancy the COE focused on the following audit objectives:

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Barbara Jordan – District 1 County Commission Candidate**

1. Verify that the candidate complied with County Code §12-22 (e)(1), which sets forth the expenditure limits for those candidates who receive public financing.
2. Verify that the candidate complied with County Code §12-22 (g), which pertains to the “Use of Funds.” This section describes six (6) types of expenditures that public funds cannot be used for, which are as follows:
 - a. Clothing for a candidate or an immediate family member of the candidate, except for a political advertisement as defined in Florida Statute §106.001 (17). An immediate family member is defined as the spouse, parents, children, and siblings of the candidate.
 - b. The purchase or rental of any vehicle for a candidate.
 - c. The enhancement of any vehicle owned by a candidate or an immediate family member of the candidate.
 - d. Personal grooming or cosmetic enhancements for a candidate.
 - e. Payment to a candidate or an immediate family member for the purchase of any goods or services.
 - f. Payment to any corporation, firm, partnership, or business entity owned or controlled by a candidate or an immediate family member for the purchase of any goods or services. “Controlled by” shall mean ownership, directly or indirectly, of 5% or more of the outstanding capital stock in any corporation, or direct or indirect interest of 5% or more in a firm, partnership, or other business entity.
3. Verify that the candidate disposed of any surplus funds remaining in the campaign account within 90-days following the election as required by County Code §12-22 (F) (6) and Florida Statute §106.141 (4).

In order to complete these objectives, the COE obtained copies of all bank statements and cancelled checks drawn against the campaign account, original and/or copies of vendor invoices and receipts, as well as any other accounting records, contracts and/or documentation which would substantiate the amount and purpose of the candidate’s campaign expenditures.

The scope of the audit encompassed the period of March 16, 2004 through January 27, 2005, which coincides with the timeframe the campaign account was opened and subsequently closed by the candidate. **(See Exhibit A for supporting documentation.)** Additionally, the COE audited 100% of all campaign expenditures as reflected on the campaign bank statements.

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SUMMARY OF CAMPAIGN ACCOUNT

The campaign account of Barbara Jordan had a total of \$256,700.76 available to run the candidate's election campaign. Of the total \$256,700.76 in campaign funds, \$125,000 was received from the County's Election Campaign Financing Trust Fund and the remaining \$131,700.76 was acquired through private contributions, loans from the candidate, and in-kind services. A breakdown of how the campaign funds were used is illustrated in Table I below:

TABLE I

BREAKDOWN OF EXPENSES			
Expense Type	Dollar Amount of Expenses	% of Total Expenses	Allowable per §12-22 (g)?
Advertising/Promotional	\$103,019.61	40%	Y
Bank Fees	948.00	-	Y
Campaign Consultant/Worker Wages	2,325.00	1%	Y
Campaign Consultants	30,925.00	12%	Y
Campaign Fees	360.00	-	Y
Campaign Supplies	560.00	-	Y
Campaign Worker Wages	11,505.00	5%	Y
Car Rental ¹	969.00	-	Y
Computer Software	5,474.44	2%	Y
Computer Supplies/Equipment	425.00	-	Y
Courier Service	174.35	-	Y
Marketing	29,872.11	12%	Y
Miscellaneous Expenses ²	258.72	-	Y
Office Supplies	525.00	-	Y
Political Consultant	3,800.00	2%	Y
Postage	1,348.00	-	Y
Printing Services	31,153.21	12%	Y
Promotional Fees	3,469.00	2%	Y
Reimbursements	12,897.41	5%	Y
Rental Fees	13,682.00	5%	Y
Security Service	550.00	-	Y
Utilities	2,459.91	2%	Y
TOTAL:	\$256,700.76	100%	

¹ This car rental was NOT for the candidate. The campaign rented a van for Election Day. No exception noted.

² This Miscellaneous Expense was for a bar code scanner.

REVIEW FOR COUNTY CODE COMPLIANCE

1. Expenditure Limits

Based on a review of the Campaign Treasurer's Reports (CTR), bank statements, cancelled checks, vendor invoices and receipts, the COE notes that the candidate exceeded the \$100,000 expenditure limit set forth by County Code §12-22 (e)(2) during the run-off election held on November 2, 2004. For the Commission candidates, total campaign expenditures are limited to \$150,000 during the primary election and \$100,000 during the run-off election. The candidate's expenditures during the primary election totaled \$145,334.84; however, during the run-off election, the candidate's expenditures totaled \$111,365.92, which exceeds the \$100,000 limit by \$11,365.92.

2. Use of Funds

To verify the candidate's compliance with County Code §12-22 (g), the COE scheduled all check payments issued from the campaign bank account and vouched each expense to supporting documentation (i.e., receipt or invoice). The COE also researched whether the candidate made payments to any immediate family members for goods or services; and/or any business entity owned or controlled by the candidate or an immediate family member.

AUDIT FINDINGS

A review of supporting documentation revealed that the candidate made three (3) expenditures totaling \$5,750.00 that are disallowed per County Code §12-22 (g). **(See Exhibit B for supporting documentation.)**

- a. Two (2) expenditures totaling \$1,950.00 were made by the Barbara Jordan campaign for campaign advertisements in *The Gospel Truth Newspaper*, which is owned and operated by her sister, Ms. Sandy Walker. The first payment was made on August 2, 2004, in the amount of \$1,350.00, for two ½ page advertisements that were published in July and August 2004. The second payment was made on October 28, 2004, in the amount of \$600.00, for a ½ page advertisement that was published in November 2004.
- b. On August 24, 2004, the candidate made a third payment in the amount of \$3,800 to Ms. Walker, for political consulting services.

However, given that Florida Statute §106.021(1) requires that candidates maintain one campaign depository for the purpose of depositing all contributions and disbursing all expenditures, the COE cannot distinguish between public funds and private contributions that are commingled in the same bank account. Therefore, the COE assumes that the \$5,750.00 in disallowable expenditures was paid for with private funds since they did not exceed the \$131,700.76 the candidate raised in private contributions. **NO EXCEPTIONS NOTED.**

3. Disposal of Surplus Funds

County Code §12-22 (f)(6) and Florida Statute §106.141(4) require that the candidate dispose of any surplus funds remaining in the campaign account within 90 days of the election date. Given that the District 1 County Commission race was decided in the run-off election held on November 2, 2004, the 90-day period for returning any surplus funds ended on January 31, 2005.

Based on a review of bank statements the COE notes that the campaign bank account was closed on January 27, 2005, at which time there was a balance of \$46.72. The \$46.72 was withdrawn in the form of an official bank check made payable to Barbara Jordan, the candidate, as a reimbursement for personal loans which the candidate made to the campaign. The COE verified that the candidate did in fact personally loan the campaign \$3,500 during the course of the election period. (See Exhibits C & D for supporting documentation.)

NO EXCEPTIONS NOTED.

REVIEW FOR FL STATUTE IX, CHAPTER 106, CAMPAIGN FINANCING COMPLIANCE

Election campaign finance laws are found in Florida Statute Chapter 106, Campaign Financing, and interpretations of these statutes are provided by the Florida Elections Commission in the form of Elections Opinions. As part of this audit, the also COE reviewed the candidate's campaign account for compliance with the Florida statutes.

Through inquiry of individuals associated with the Barbara Jordan campaign and review of the candidate's campaign bank account records, cancelled checks, related vendor invoices, and other supporting campaign expenditure documentation, the COE noted the following audit findings:

1. Cash Payments to Campaign Workers

The COE noted that both the campaign treasurer and some campaign consultants made cash payments to poll workers and other campaign vendors, which is prohibited by Florida Statute 106.11(1)(a). The only cash payments allowed under state law are for petty cash, which is addressed in Florida Statute 106.12, "Petty Cash Funds Allowed." This statute specifically states that the only campaign expenditures allowed to be paid using *petty cash* are as follows:

- a) Office supplies;
- b) Transportation expenses; and,
- c) Other necessities (i.e., when the campaign check book is not readily available to pay for incidentals.

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In an effort to educate voters about the District 1 commission race, the Barbara Jordan campaign implemented the grass roots campaign initiative known as “Get-Out-The-Vote (GOTV).” GOTV consisted of teams of canvassers going door-to-door in various areas of the District to pass out Barbara Jordan campaign literature and to answer questions voters may have concerning the candidate. The canvassers were paid either on a daily or weekly basis by Mr. Anthony Brunson, the Campaign Treasurer, or by Mr. Wade Jones, the Campaign Manager. Both Mr. Brunson and Mr. Jones also made cash payments to the campaign’s poll workers and vendors that provided goods and services to the campaign.

The following information describes the above-mentioned cash payments in detail:

a. Cash Payments made by Campaign Treasurer Anthony Brunson

Mr. Brunson cashed out two (2) checks totaling \$13,500.00, from the Barbara Jordan campaign account for the GOTV effort.

- On August 30, 2004, Mr. Brunson cashed out Check No. 1107 for \$6,000. In a written statement provided to the COE by Mr. Brunson, he stated that \$5,370.73 was used to pay poll workers for Election Day tasks, to buy food and water for campaign staff members, and for incidental costs such as transportation, supplies and other miscellaneous GOTV expenses. Mr. Brunson provided a list of names for the 24 poll workers who received a cash payment of \$75 each, which totals \$1,800.00. He also provided receipts for other expenses such as car rental fees, food, and other items totaling \$1,773.04.

On September 10, 2004, Mr. Brunson re-deposited cash in the amount of \$706.77, into the campaign account. Therefore, of the \$6,000 in cash, the COE was unable to account for the remaining balance of \$1,720.19. **(See Exhibit E for supporting documentation.)**

- On November 1, 2004, Mr. Brunson cashed out Check No. 1161 for \$7,500. A list of names and social security numbers for 90 poll workers, who received cash payments of \$75 each for a total of \$6,750.00, was provided by Mr. Brunson. Therefore, of the \$7,500.00 in cash, the COE was unable to account for the remaining balance of \$750.00. **(See Exhibit F for supporting documentation.)**

b. Cash Payments made by Campaign Manager Wade Jones

Based on review of cancelled checks and supporting documentation, the Campaign Manager Wade Jones cashed out eleven (11) checks, totaling \$14,505.00, for the purpose of making cash payments to campaign workers. At the request of the COE, Mr. Jones provided time sheets for the campaign workers that he issued cash payments to, which only accounted for \$8,462.03 of the \$14,505.00 cashed out by Mr. Jones. Therefore, the COE could not substantiate whether the remaining balance of \$6,042.97 was spent on legitimate campaign expenditures. (See Exhibit G for supporting documentation.)

2. Expenditures in Furtherance of the Campaign Through Third Parties

Florida Statutes §106.021(3) and §106.11(1) prohibit direct or indirect campaign expenditures in furtherance of a candidate's election campaign except through the duly appointed campaign treasurer. When a candidate makes payments to an individual or corporate entity, which then uses those funds to transact business on behalf of the candidate with third parties, those individuals and/or entities are viewed as "intermediaries" under the Florida statutes. Therefore an intermediary that spends campaign funds on behalf of the candidate prevents full public disclosure as to how those funds were actually spent.

Additionally, Florida Statute §106.11(1) prohibits the expenditure of campaign funds on behalf of a candidate from any bank account other than the candidate's primary campaign account. Therefore any campaign expenditure made by an intermediary on behalf of the candidate from the intermediary's personal and/or business bank account is in violation of Florida Statute §106.11(1).

AUDIT FINDING

Based on review of cancelled checks and supporting documentation, the Barbara Jordan campaign contracted with the "Haitian Evangelical Christian Association, Inc." (HECA), in order to accomplish its GOTV mission within the Haitian community in the District. More specifically, the Barbara Jordan campaign paid HECA a total of \$3,648.25 on August 14, 2004 for Election Day Haitian-American GOTV expenses. The payments covered expenses for the following items: \$2,475.00 for poll workers; \$475.95 for HECA's fee; \$300.00 for area coordinators; \$208 for meals; \$130.00 for car rental fees; and \$60.00 for gasoline. (See Exhibit H for supporting documentation.)

3. Campaign Payments to Media Consultants for the Purchase of Media

Florida Statute §106.11(1), relating to the reporting of advertising consultant costs and actual advertising costs, has been held by the Florida Elections Commission to mean the following:

“A candidate who is procuring both media related consultant services and mass media political advertisements *must issue separate checks drawn on the campaign account to media consultant for their services and to each media outlet that is providing advertising services.*” [See DE 86-14.]

Additionally, the Florida Elections Commission opined in decision DE 03-08 that Florida Statute §106.021(3) does *not* allow expenditures to be made either directly or indirectly in furtherance of the candidacy of any person. Thus, if a media-consulting firm was to pay for a candidate’s actual advertisements it would be considered a direct expenditure in furtherance of the candidate and as such, is prohibited because the expense incurred was not paid directly from the candidate’s campaign account and does not provide full public disclosure of where the campaign dollars are being spent.

AUDIT FINDING

Stephanie Bromfield-Warnell/SBW & Associates

Based on review of cancelled checks and supporting documentation for media consultants, the COE found that the Barbara Jordan campaign made three (3) payments totaling \$11,300.69, to a media consultant, Ms. Stephanie Bromfield-Warnell, and/or her company, “SBW & Associates,” for the purchase of media rather than issuing check payments directly to the media outlet from the campaign bank account. The following is a breakdown of the three payments:

- On June 4, 2004, SBW & Associates invoiced the Barbara Jordan Campaign for \$9,960.00 to purchase airtime on radio stations HOT105 and WEDR. The campaign originally issued individual checks from the campaign bank account to each radio station in the amount of \$5,000 (\$10,000 in total) for the abovementioned airtime. However, with the permission of Ms. Sandy Walker, a political consultant, Ms. Bromfield-Warnell was allowed to pay the radio stations directly from her business checking account for the radio airtime. It is noted that Ms. Bromfield-Warnell returned the two original checks to the campaign, which were subsequently voided out. **(See Exhibit I for supporting documentation.)**
- On July 14, 2004, Stephanie Bromfield-Warnell invoiced the Barbara Jordan Campaign for \$238.69 as a reimbursement for the purchase of a *Miami Times* advertisement. At the request of the COE, Ms. Bromfield-Warnell provided a copy of the *Miami Times* ad and a copy of Check No. 1528 (front side only) that was drawn from her business account to purchase the ad. **(See Exhibit J.)**

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- On August 24, 2004, SBW & Associates received a payment from the Barbara Jordan Campaign in the amount of \$1,102 as a reimbursement for advertising expenses incurred by SBW. The COE requested supporting documents for this payment and as of the date of the draft audit report no supporting documentation has been received from SBW & Associates to substantiate how these campaign funds were spent on behalf of the Barbara Jordan campaign. (See Exhibit K.)

OTHER FINDINGS

1. IRS Forms 1099-MISC

In the process of examining the campaign accounting records, the COE found that the campaign failed to complete and file IRS Forms 1099 for two consultants that received payments equal to or greater than \$600.00.

2. Campaign Treasurer's Report Missing Campaign Expenditure Paid

The COE noted that a check payment for \$7,500 made payable to the Campaign Treasurer, Mr. Anthony Brunson, and dated November 1, 2004 was not reported on the Campaign Treasurer's Report (CTR) for the G4-04 reporting period. Based on examination of the cancelled check, the COE noted that the \$7,500 campaign check was cashed out by Mr. Brunson to pay poll workers \$75 each for the "Get out the Vote - GOTV" effort. The COE discussed the omission of this campaign expense with Mr. Brunson, who explained it was an oversight on his part to not report it. Mr. Brunson subsequently filed an amended CTR G4-04 to disclose this \$7,500 expenditure. (See Exhibit L.)

AUDIT CONCLUSION

Overall, the COE concluded that the campaign expenditures were in compliance with the requirements of the Miami-Dade County Code §12-22 (G), "Use of Funds," as no disallowed expenses were paid with public funds. However, the COE found that the \$100,000 expenditure limit set forth in County Code §12-22 (e) (2) had been exceeded during the run-off election period. Specifically, the campaign's expenditures during the run-off election totaled \$111,365.92, which is \$11,365.92 greater than the \$100,000 expenditure cap. Lastly, the COE noted a few instances of noncompliance with Florida Statute Section 106, "Campaign Financing."

The COE appreciates the cooperation extended by those individuals involved with the Barbara Jordan campaign throughout the course of this audit.

EXHIBITS

- A. Confirmation of campaign account closure
- B. Documentation for payments to Gospel Truth Newspaper and Sandy Walker
- C. Documentation re: candidate loans
- D. Documentation re: candidate loans
- E. Check payment to Campaign Treasurer for GOTV
- F. Memo from Campaign Treasurer documenting use of GOTV check payment
- G. Second Check payment to Campaign Treasurer for GOTV
- H. Schedule of payments to Campaign Manager, Wade Jones
- I. Documentation for HECA, Inc.
- J. Payments to SBW & Associates for media purchases
- K. SBW & Associates Invoices
- L. Check payment to SBW & Associates
- M. Copy of amended Campaign Treasurer's Report for the inclusion of a GOTV payment to Campaign Treasurer

APPENDIX

- 1. Campaign's Response to the Draft Audit Report

**COMMISSION ON ETHICS & PUBLIC TRUST
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**BARBARA JORDAN
COMMISSION CANDIDATE 2004**

RESPONSE TO DRAFT REPORT

On May, 12 2005, the COE provided a draft audit report to the Honorable Barbara Jordan, Board of County of Commissioners, and the Campaign Treasurer, Anthony Brunson, and gave the campaign the opportunity to respond to the COE audit findings. The COE requested for the campaign to review the draft audit report and if they so chose, to provide a written response within 15 business days, or by Thursday, June 2, 2005.

Additionally, the Barbara Jordan Campaign requested an extension of time to respond to the draft audit report and the COE extended the due date for a written response to Thursday, June 9, 2005. Therefore, the Barbara Jordan campaign provided the attached response to the audit draft report as of the extended due date.